

# **EXHIBIT A**

**Ogor Okoye**

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**From:** Ogor Okoye  
**Sent:** Monday, May 10, 2021 1:24 PM  
**To:** Travis Pregent  
**Subject:** Re: Umuoji Improvement Union North America Inc. v. UIU (NA) Inc. et. al 1:20-cv-12229-NMG

Attorney Pregent,

In light of the court's order last week, I had a meeting with the defendants and their members last night and they want this matter resolved as expeditiously as possible given the fact that they do not want to continue expending money in court when they have a medical facility in dire need of equipment's and many people depending on the life-saving care that medical facility would be providing. They wanted me to propose a meeting between 4 of their members with four of our members in an attempt to settle these claims outside of the court.

While they are not opposed to the court's proposed appointment of a master, they are unwilling to expend the costs of going through this route when the monies should go towards the medical center. Please advise on whether your clients are amenable to this proposal so that I would know how to proceed going forward.

Best,

Ogor Winnie Okoye

BOS Legal, LLC.  
Attorneys & Counselors at Law  
20 Central Ave, Ste. 513  
Lynn, MA 01901  
Tel/Fax: (781) 596-0151  
[www.boslegals.com](http://www.boslegals.com)

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## Ogor Okoye

---

**From:** Ogor Okoye  
**Sent:** Monday, May 10, 2021 2:02 PM  
**To:** Travis Pregent  
**Subject:** RE: Umuoji Improvement Union North America Inc. v. UIU (NA) Inc. et. al 1:20-cv-12229-NMG

Attorney Pregent,

I was confused when I received your email about your proposed mediators. In any case, as stated in my email, we are agreeable to the court's proposal relative to the appointment of a special master whose role would be to supervise the emergency meeting of the membership to choose managers of the organization, oversee the adoption of a new and comprehensible bylaws and make a written report to the court.

Our first proposal would be speaking with the other side where each side brings out 4 individuals in an attempt to resolve this. Should this option not be acceptable to your clients, then of course, the court's order as stated above would be our next consideration. My clients are I do not have funds to continue with endless litigation when there is a medical center that needs equipments.

I would wait to hear back from you.

Best,

Ogor Winnie Okoye

**From:** Travis Pregent <Travis@pregentlaw.com>  
**Sent:** Monday, May 10, 2021 1:52 PM  
**To:** Ogor Okoye <owo@boslegals.com>  
**Subject:** Re: Umuoji Improvement Union North America Inc. v. UIU (NA) Inc. et. al 1:20-cv-12229-NMG

Attorney Okoye:

I must have sent my email around the same time you sent yours. In any event, I will discuss your email with my client and get back to you.

Sincerely,

Travis

On Mon, May 10, 2021 at 1:24 PM Ogor Okoye <[owo@boslegals.com](mailto:owo@boslegals.com)> wrote:

Attorney Pregent,

In light of the court's order last week, I had a meeting with the defendants and their members last night and they want this matter resolved as expeditiously as possible given the fact that they do not want to continue expending money in court when they have a medical facility in dire need of equipment's and many people depending on the life-saving care

that medical facility would be providing. They wanted me to propose a meeting between 4 of their members with four of our members in an attempt to settle these claims outside of the court.

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Travis T. Pregent, Esq.

**PREGENT LAW**

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One Hundred Cummings Center, Suite 207P, Beverly, MA 01915  
Office. 978.381.3256 | Cell. 978-317-2203 | Fax. 978.633.9048  
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## Ogor Okoye

---

**From:** Ogor Okoye  
**Sent:** Monday, May 10, 2021 2:03 PM  
**To:** Travis Pregent  
**Subject:** RE: Mediator

Attorney Pregent,

Kindly find my response in the other email.

Best,

Ogor Winnie Okoye

---

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20 Central Avenue, Ste. 513  
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**From:** Travis Pregent <Travis@pregentlaw.com>  
**Sent:** Monday, May 10, 2021 1:36 PM  
**To:** Ogor Okoye <owo@boslegals.com>  
**Subject:** Mediator

Attorney Okoye:

Pursuant to the Court's Preliminary Injunction and Order of May 4, 2021, my clients will agree to retain a mediator and I have included below a list of three possible options:

Bonnie McCloud, Ret.



Nancy Staffier-Holtz, Ret.  
Brad Honoroff

Please let me know if your clients agree to a mediator and if you have any preferences regarding the same.

Sincerely,

Travis

--

Travis T. Pregent, Esq.

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## Ogor Okoye

---

**From:** Travis Pregent <Travis@pregentlaw.com>  
**Sent:** Wednesday, May 12, 2021 10:51 AM  
**To:** Ogor Okoye  
**Subject:** Re: Umuoji Improvement Union North America Inc. v. UIU (NA) Inc. et. al 1:20-cv-12229-NMG

Attorney Okoye:

My client's are willing to re-extend their previous offer containing the following terms:

1. Defendants agree to stop using the Umuoji Improvement Union ("UIU") name;
2. Defendants agree to stop using UIU's IRS tax identification number; and
3. All pending litigation be dismissed with prejudice

If you/your clients do not agree to this offer and do not wish to appoint a mediator then, pursuant to the Court's Order, a master will be appointed with both sides responsible for costs.

Sincerely,

Travis

On Mon, May 10, 2021 at 2:02 PM Ogor Okoye <[owo@boslegals.com](mailto:owo@boslegals.com)> wrote:

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**To:** Ogor Okoye <[owo@boslegals.com](mailto:owo@boslegals.com)>

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